



THE CITY OF NEW YORK
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December 5, 2014

VIA ECF

Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

Re: Ramos v. City of New York, et al.
13 Civ. 9225 (KBF)

Dear Judge Forrest:

I am the Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent defendants in the above referenced action. On November 21, 2014, the parties appeared for a settlement conference before Judge Cott at which the parties arrived at a settlement in principal with respect to plaintiffs in the ranks of Lieutenants and Captains. The parties also indicated to Judge Cott that they would be in a position to file a settlement stipulation by December 5, 2014.

The parties have since agreed to the language of the settlement stipulation. Further, as per the parties' discussion at the settlement conference, on December 3, 2014, defendants provided plaintiffs with a final calculation of the settlement amount which utilized the methodology agreed upon at the conference. On December 4, 2014, plaintiffs' counsel advised that he retained an expert to review defendants' calculation and estimates that this review will be completed shortly. Therefore, the parties respectfully request that they be permitted to file the settlement stipulation by December 12, 2014.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

Andrea O'Connor
Assistant Corporation Counsel

cc: Fausto Zapata, Attorney for Plaintiff (by electronic mail and ECF)